

Before the
Federal Communications Commission
Washington, D.C. 20554
FCC Docket No. 93-136
PR Docket No. 93-59

In the Matter of
Amendment of the Commission's
Rules to allocate 449 Mhz
for wind profiler systems.

) FCC Docket No. 93-136
) ET Docket No. 93-59
)
)

June 12, 1993

To: The Federal Communications Commission

COMMENTS OF THE PORTLAND AMATEUR RADIO CLUB

- 1 These comments are submitted by the Portland Amateur Radio Club (PARC). The Portland Amateur Radio Club is located in the metropolitan area of Portland, Oregon. The club is a major responder for the City of Portland, Oregon Office of Emergency Management, is affiliated with the Oregon Trail Chapter of the Red Cross Emergency Services, and supports numerous public service events with emergency communications, such as Artquake and the Portland Marathon.
- 2 **Meteorological aids proposed for inappropriate spectrum**

5 **Active bands disrupted**

Further, we note that both of the proposed bands, 449 MHz and 915 MHz are very active and busy bands. Imposing the burden of an additional service on these bands will diminish the useability of the bands.

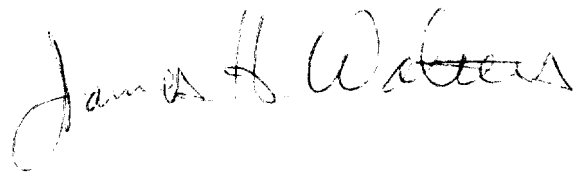
6 **Technical protection not supported in the docket**

Amateur Radio Service (ARS) frequency coordinators and repeater operators who are most affected by the proposals of this docket were not consulted during discussions on this matter. However, we understand that in discussion between the ARRL and the NTIA, commitments were made to protect ARS repeaters by the use of beam tilt, shielding and other technical means. Although we oppose this reallocation, we also feel that, should this docket be adopted, these commitments should be reflected in the service rules for wind profiler systems.

7 **Frequency Coordinator resource overlooked**

We note that the proposed docket would require notification of repeater operators listed in the ARRL repeater directory. While we agree with the notification requirement, we strongly recommend that local frequency coordinators also be contacted. Local frequency coordinators are listed in the same ARRL directory. They are the only resource that maintains a data base of operating systems, both published and un-published. The limited data contained in the ARRL repeater directory is obtained from these organizations. At best the repeater directory is 8 to 10 months out of date and does not contain un-published listings. Notification of the local frequency coordinators will provide access to the most current and accurate list of ARS operators.

Respectfully submitted,
The Portland Amateur Radio Club

A handwritten signature in black ink, appearing to read "James H. Walters". The signature is fluid and cursive, with the first name "James" being the most prominent part.

By
James H Walters, WB7AAK
Chair, PARC Legal Affairs Committee